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*Rovio Entertainment Corporation*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROVIO ENTERTAINMENT CORPORATION,

*Plaintiff*

v.

ALL PRINTED CLOTHES FACTORY STORE,  
DAJUN CLOTHES STORE, DEHUA BEAUTY RICH  
ARTS & CRAFTS CO., LTD., DONGGUAN  
DREAMY TOY CO., LTD., DONGGUAN JIELI  
PLASTIC TOYS CO., LTD., DONGGUAN RICH  
POWER TIN MFG. LTD., DONGGUAN SHANG  
ZHEN ART GIFTS CO., LTD., DONGGUAN  
SIYUAN TOY CO., LIMITED, ETST WENDY  
CHILDREN'S FACTORY OUTLET STORE, ETST  
WENDY FUNNY STORE, EYEMASK666 STORE,  
GOLDEN CHILDHOOD01 STORE, GOLDEN  
CRADLE KIDS STORE, GOLDEN CRADLE STORE,  
GT COMMANDER STORE, GUANGZHOU  
CAIDAO INDUSTRIAL CO., LTD., GUANGZHOU  
KAI RONG INDUSTRIAL CO., LTD., GUANGZHOU  
TAKU CULTURE MEDIA CO., LTD., GUANGZHOU  
TOP GLAMOUR COSMETIC CO., LTD.,  
HEARTBEAT PLUSH STORE, HEBEI LINGMOU

CIVIL ACTION No.  
21-cv-7569 (DLC)

~~[PROPOSED]~~  
FINAL DEFAULT JUDGMENT  
AND PERMANENT  
INJUNCTION ORDER

TRADING CO., LTD., HEY SURPRISE STORE, HIGH QUALITY 847 STORE, HIGH QUALITY 999 STORE, HONGCHENG'S STORE, JEBMQ STORE, JUESEJUIA STORE, KIDS GAME TSHIRT FACTORY STORE, LABELZONE OFFICIAL STORE, LL-PLUSH STORE, MIAY'S KIDS ROOM STORE, MR YE. STORE, MUGIVALA FRANCHISED STORE, NANCHANG KEDA STATIONERY GIFTS INDUSTRIAL CO.,LTD, NEW OOPS STORE, NINGBO GMT LEISURE PRODUCTS CO., LTD., OU YIN STORE, OUR WORLD CHILDREN STORE, PANLANDE ACCESSORIES STORE, PARAGLIDING STORE, PERSONALIZEDSHOES STORE, PLEASANT KEYCHAIN STORE, PRINT CLOTHES FACTORY DISCOUNT STORE, PRINTING CHILDREN'S CLOTHES STORE, PUJIANG MINGJIU E-COMMERCE CO., LTD., QUALITY CHILD TOY STORE, QUANZHOU GUANGHE MINGLIANG TRADING CO., LTD., QUANZHOU ORANGE PEEL E-COMMERCE CO., LTD., QUANZHOU YOHO YOHO TRADING CO., LTD., SHANG HAI ROSE STORE, SHANGHAI FUNNYBUDDY CO., LTD., SHANTOU YACHAO TRADING CO., LTD., SHENZHEN NEWJOY TECHNOLOGY CO., LTD., SHENZHEN USMARTALL TECHNOLOGY CO., LTD., SHENZHEN YOKO LABELWORKS LIMITED, SHOP5282050 STORE, SHOP5379093 STORE, SHOP5788211 STORE, SHOP910323284 STORE, SHOP910364092 STORE, SHOP911252065 STORE, SHOP911297209 STORE, SHOP911602222 STORE, SHOP911758373 STORE, SMILING CENTER STORE, SOXTOWN (SHANGHAI) INDUSTRIAL CO., LTD., SUNYDREAMS ANIMATION STORE, TAKE OFF STORE, VANQUISH A DIFFERENT STORE, WANCHEN STORE, WENZHOU HIGH AND LONG CO., LTD., XIAMEN HULI HUANGXIAODUAN PET PRODUCTS STORE, XINXIANG YINGLAIDA IMPORT AND EXPORT TRADING CO., LTD., YANGZHOU TIRIS CRAFTS CO., LTD., YANGZHOU YIYABAO TOYS & GIFTS CO., LTD., YEJIANFEIXING STORE, YIWU BIWEI TRADE CO., LTD., YIWU DONGHONG KNITTING CO., LTD., YIWU HEPIN FOOD CO., LTD., YOUPIN TOY STORE, YOUR DIARY STORE, YULIN

JEWELLERY STORE, YUZENGXIANGBABY  
STORE, ZHEN XIANG TECHNOLOGY CO., LTD.,  
ZHENGHONGKAI03'S STORE and ZHUO JIU  
STORE,








*Defendants*

**GLOSSARY**


<b><u>Term</u></b>	<b><u>Definition</u></b>	<b><u>Docket Entry Number</u></b>
<b>Plaintiff or Rovio</b>	Rovio Entertainment Corporation	N/A
<b>Defendants</b>	All Printed Clothes Factory Store, Dajun clothes Store, Dehua Beauty Rich Arts & Crafts Co., Ltd., Dongguan Dreamy Toy Co., Ltd., Dongguan Jieli Plastic Toys Co.,Ltd, Dongguan Rich Power Tin Mfg. Ltd., Dongguan Shang Zhen Art Gifts Co., Ltd., Dongguan Siyuan Toy Co., Limited, ETST WENDY Children's Factory Outlet Store, ETST WENDY Funny Store, Eyemask666 Store, Golden childhood01 Store, Golden Cradle Kids Store, Golden cradle Store, GT Commander Store, Guangzhou Caidao Industrial Co., Ltd., Guangzhou Kai Rong Industrial Co., Ltd., Guangzhou Taku Culture Media Co., Ltd., Guangzhou Top Glamour Cosmetic Co., Ltd., Heartbeat Plush Store, Hebei Lingmou Trading Co., Ltd., Hey Surprise Store, High quality 847 Store, High quality 999 Store, HongCheng's Store, JEBMQ Store, juesejulia Store, Kids game tShirt Factory Store, labelzone Official Store, LL-plush Store, Miay's Kids Room Store, Mr Ye. Store, MUGIVALA Franchised Store, Nanchang Keda Stationery Gifts Industrial Co.,ltd, NEW OOPS Store, Ningbo GMT Leisure Products Co., Ltd., Ou Yin Store, Our World Children Store, Panlande accessories Store, Paragliding Store, Personalizedshoes Store, Pleasant keychain Store, print clothes factory discount Store, printing children's clothes Store, Pujiang Mingjiu E-Commerce Co., Ltd., Quality child toy Store, Quanzhou Guanghe Mingliang Trading Co., Ltd., Quanzhou Orange Peel E-Commerce Co., Ltd., Quanzhou Yoho Yoho Trading Co., Ltd., Shang hai Rose Store, Shanghai Funnybuddy Co., Ltd., Shantou Yachao Trading Co., Ltd., Shenzhen Newjoy Technology Co., Ltd., Shenzhen Usmartall Technology Co., Ltd., Shenzhen Yoko Labelworks Limited, Shop5282050 Store, Shop5379093 Store, Shop5788211 Store, Shop910323284 Store, Shop910364092 Store, Shop911252065 Store, Shop911297209 Store, Shop911602222 Store, Shop911758373 Store, smiling center Store, Soxtown (Shanghai) Industrial Co., Ltd., Sunydreams Animation Store, take off Store, Vanquish a different Store, WANCHEN Store, Wenzhou High And Long Co., Ltd., Xiamen Huli Huangxiaoduan Pet	N/A

	Products Store, Xinxiang Yinglaida Import And Export Trading Co., Ltd., Yangzhou Tiris Crafts Co., Ltd., Yangzhou Yiyabao Toys & Gifts Co., Ltd., YeJianFeiXing Store, Yiwu Biwei Trade Co., Ltd., Yiwu Donghong Knitting Co., Ltd., Yiwu Hepin Food Co., Ltd., Youpin toy Store, Your Diary Store, Yulin JEWELLERY Store, YuZengXiangBaby Store, Zhen Xiang Technology Co., Ltd., Zhenghongkai03's Store and ZHUO JIU Store	
<b>Defaulting Defendants</b>	All Printed Clothes Factory Store, Dajun clothes Store, Dehua Beauty Rich Arts & Crafts Co., Ltd., Dongguan Dreamy Toy Co., Ltd., Dongguan Jieli Plastic Toys Co.,Ltd, Dongguan Rich Power Tin Mfg. Ltd., Dongguan Siyuan Toy Co., Limited, ETST WENDY Children's Factory Outlet Store, ETST WENDY Funny Store, Eyemask666 Store, Golden childhood01 Store, Golden Cradle Kids Store, Golden cradle Store, GT Commander Store, Guangzhou Caidao Industrial Co., Ltd., Guangzhou Kai Rong Industrial Co., Ltd., Guangzhou Taku Culture Media Co., Ltd., Guangzhou Top Glamour Cosmetic Co., Ltd., Heartbeat Plush Store, Hey Surprise Store, High quality 847 Store, High quality 999 Store, HongCheng's Store, JEBMQ Store, juesejulia Store, labelzone Official Store, LL-plush Store, Miay's Kids Room Store, Mr Ye. Store, MUGIVALA Franchised Store, Nanchang Keda Stationery Gifts Industrial Co.,ltd, NEW OOPS Store, Ningbo GMT Leisure Products Co., Ltd., Ou Yin Store, Our World Children Store, Panlande accessories Store, Paragliding Store, Personalizedshoes Store, Pleasant keychain Store, print clothes factory discount Store, printing children's clothes Store, Pujiang Mingjiu E-Commerce Co., Ltd., Quality child toy Store, Quanzhou Guanghe Mingliang Trading Co., Ltd., Quanzhou Orange Peel E-Commerce Co., Ltd., Quanzhou Yoho Yoho Trading Co., Ltd., Shang hai Rose Store, Shanghai Funnybuddy Co., Ltd., Shantou Yachao Trading Co., Ltd., Shenzhen Newjoy Technology Co., Ltd., Shenzhen Usmartall Technology Co., Ltd., Shenzhen Yoko Labelworks Limited, Shop5282050 Store, Shop5379093 Store, Shop5788211 Store, Shop910323284 Store, Shop910364092 Store, Shop911252065 Store, Shop911297209 Store, Shop911602222 Store, Shop911758373 Store, smiling center Store, Soxtown (Shanghai) Industrial Co., Ltd., Sunydreams Animation Store, take off Store, Vanquish a different Store, WANCHEN Store, Wenzhou High	N/A

	And Long Co., Ltd., Xiamen Huli Huangxiaoduan Pet Products Store, Xinxiang Yinglaida Import And Export Trading Co., Ltd., Yangzhou Yiyabao Toys & Gifts Co., Ltd., YeJianFeiXing Store, Yiwu Biwei Trade Co., Ltd., Yiwu Hepin Food Co., Ltd., Youpin toy Store, Your Diary Store, Yulin JEWELLERY Store, YuZengXiangBaby Store, Zhen Xiang Technology Co., Ltd., Zhenghongkai03's Store and ZHUO JIU Store	
<b>Alibaba</b>	Alibaba.com, an online marketplace platform that allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, offer for sale, sell, distribute and ship their wholesale and retail products originating from China directly to consumers across the world and specifically to consumers residing in the U.S., including New York	N/A
<b>AliExpress</b>	AliExpress.com, an online marketplace platform that allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, offer for sale, sell, distribute and ship their wholesale and retail products originating from China directly to consumers across the world and specifically to consumers residing in the U.S., including New York	
<b>Sealing Order</b>	Order to Seal File entered on September 3, 2021	Dkt. 1
<b>Complaint</b>	Plaintiff's Complaint filed on September 10, 2021	Dkt. 9
<b>Application</b>	Plaintiff's <i>Ex Parte</i> Application for: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts (as defined <i>infra</i> ) and Defendants' Assets (as defined <i>infra</i> ) with the Financial Institutions (as defined <i>infra</i> ); 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery filed on September 10, 2021	Dkts. 11-14
<b>Hagelstam Dec.</b>	Declaration of Robert Hagelstam in Support of Plaintiff's Application	Dkt. 13
<b>Futerman Dec.</b>	Declaration of Daniele S. Futerman in Support of Plaintiff's Application	Dkt. 12
<b>TRO</b>	1) Temporary Restraining Order; 2) Order Restraining Merchant Storefronts and Defendants' Assets with the Financial Institutions; 3) Order to Show Cause Why a Preliminary Injunction Should Not Issue; 4) Order Authorizing Bifurcated and Alternative Service; and 5) Order Authorizing Expedited Discovery entered on September 10, 2021	15


<b>PI Show Cause Hearing</b>	October 14, 2021 hearing to show cause why a preliminary injunction should not issue	N/A
<b>PI Order</b>	October 14, 2021 Preliminary Injunction Order	7
<b>Angry Birds Products</b>	A puzzle video game, where players use a slingshot to launch birds at pigs stationed at various structures with the ultimate goal of destroying all the pigs	N/A
<b>Angry Birds Marks</b>	<p>U.S. Trademark Registration Nos.: 4,200,545, 4,148,716, and 3,976,576 for “ANGRY BIRDS” for a wide variety of goods in Classes 8, 9, 16, 20, 21, 25, 30, 36 and 41; U.S. Trademark Registration Nos. 6,331,350,</p> <p> , for 4,252,003, 4,145,113 and 3,988,064 for  , for a wide variety of goods in Classes 3, 9, 14, 16, 18, 21, 24, 25, 28, 30, 32, 33, 34, 35, 36, 38, 41 and 43; U.S.</p> <p>Trademark Registration No. 4,493,031 for  , for a wide variety of goods in Classes 9, 16, 18, 20, 23, 28 and 41; U.S. Trademark Registration No. 4,489,982</p> <p>for  , for a wide variety of goods in Classes 3, 5, 9, 14, 15, 16, 18, 20, 21, 24, 35, 26, 27, 28, 29, 30, 32, 33, 34, 35, 36, 38, 41 and 43; U.S. Trademark</p> <p>Registration No. 4,489,981 for  for a wide variety of goods in Classes 3, 5, 9, 14, 15, 16, 18, 20, 21, 24, 25, 26, 27, 28, 29, 30, 32, 33, 34, 35, 36, 38, 41 and 43; U.S. Trademark Registration No. 4,489,980 for</p> <p> for a wide variety of goods in Classes 9, 16, 28 and 41; U.S. Trademark Registration No. 4,489,979</p> <p>for  for a wide variety of goods in Classes 3, 5, 9, 14, 15, 16, 18, 20, 21, 24, 25, 26, 27, 28, 29, 30, 32, 33, 34, 35, 36, 38, 41 and 43; U.S. Trademark</p>	N/A




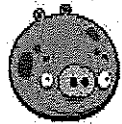
Registration No. 4,486,763 for  for a wide variety of goods in Classes 9, 16, 18, 25, 28, 30, 32, 36 and 41; U.S. Trademark Registration No. 4,486,762 for




for goods in Class 28; U.S. Trademark


Registration No. 4,545,679 for  for a wide variety of goods in Classes 9, 16, 28 and 43; U.S.


Trademark Registration No. 4,545,680 for  for a wide variety of goods in Classes 9, 16, 18, 20, 28 and 41; U.S. Trademark Registration No. 4,697,586 for




for a wide variety of goods in classes 3, 5, 9, 14, 15, 16, 18, 20, 21, 24, 25, 26, 27, 28, 29, 30, 32, 33, 34, 35, 36, 38, 41 and 43; U.S. Trademark Registration

No. 4,843,434 for  for a wide variety of goods in classes 3, 5, 9, 14, 16, 18, 20, 21, 24, 25, 27, 28, 29, 30, 32, 33, 34, 35, 36, 38, 41 and 43; U.S. Trademark

Registration No. 4,683,222 for , for a wide variety of goods in classes 9, 14, 16, 18, 20, 21, 24, 25, 28, 35, 38 and 41; U.S. Trademark Registration No.

4,493,055 for , for a wide variety of goods in Classes 9, 16, 28 and 41; U.S. Trademark Registration



	 No. 4,557,817 for , for a wide variety of goods in Classes 9, 16, 25, 28 and 41; U.S. Trademark Registration No. 4,946,692 for “HOCKEYBIRD”, for a wide variety of goods in classes 16, 24 and 25; U.S. Trademark Registration No. 4,829,609 for “ANGRY” for a variety of goods in Classes 9 and 28; U.S. Trademark Registration No. 4,152,185 for “MIGHTY EAGLE”, for a wide variety of goods in Class 28; U.S. Trademark Registration No. 4,162,825 for “BAD PIGGIES”, for a wide variety of goods in Class 9 and U.S. Trademark No. 4,607,595 for “ROVIO”, for a wide variety of goods in classes 9, 16, 28, 35, 36, 38 and 41	
<b>Counterfeit Products</b>	Products bearing or used in connection with the Angry Birds Marks, and/or products in packaging and/or containing labels bearing the Angry Birds Marks, and/or bearing or used in connection with marks and/or artwork that are confusingly or substantially similar to the Angry Birds Marks and/or products that are identical or confusingly or substantially similar to the Angry Birds Products	
<b>Infringing Listings</b>	Defendants’ listings for Counterfeit Products	N/A
<b>User Accounts</b>	Any and all websites and any and all accounts with online marketplace platforms such as Alibaba and/or AliExpress, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them	N/A
<b>Merchant Storefronts</b>	Any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in Counterfeit Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them	N/A
<b>Defendants’ Assets</b>	Any and all money, securities or other property or assets of Defendants (whether said assets are located in the U.S. or abroad)	N/A

<b>Defendants' Financial Accounts</b>	Any and all financial accounts associated with or utilized by any Defendants or any Defendants' User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad)	N/A
<b>Financial Institutions</b>	Any banks, financial institutions, credit card companies and payment processing agencies, such as PayPal Inc. ("PayPal"), Payoneer Inc. ("Payoneer"), the Alibaba Group d/b/a Alibaba.com payment services (e.g., Alipay.com Co., Ltd., Ant Financial Services Group), PingPong Global Solutions, Inc. ("PingPong") and other companies or agencies that engage in the processing or transfer of money and/or real or personal property of Defendants	N/A
<b>Third Party Service Providers</b>	Online marketplace platforms, including, without limitation, those owned and operated, directly or indirectly by Alibaba and/or AliExpress, as well as any and all as yet undiscovered online marketplace platforms and/or entities through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in Counterfeit Products which are hereinafter identified as a result of any order entered in this action, or otherwise	N/A
<b>Defendants' Frozen Assets</b>	Defendants' Assets from Defendants' Financial Accounts that were and/or are attached and frozen or restrained pursuant to the TRO and/or PI Order, or which are attached and frozen or restrained pursuant to any future order entered by the Court in this Action	N/A
<b>Plaintiff's Motion for Default Judgment</b>	Plaintiff's Motion for Default Judgment and a Permanent Injunction Against Defaulting Defendants filed on January 6, 2022	TBD
<b>Nastasi Aff.</b>	Affidavit by Gabriela N. Nastasi in Support of Plaintiff's Motion for Default Judgment	TBD

This matter comes before the Court by motion filed by Plaintiff for the entry of final judgment and permanent injunction by default against Defaulting Defendants for Defaulting Defendants' trademark infringement, trademark counterfeiting, false designation of origin, passing off and unfair competition and related state and common law claims arising out of Defaulting Defendants' unauthorized use of Plaintiff's Angry Birds Marks without limitation, in their manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying or offering for sale and/or selling and/or sale of Counterfeit Products.<sup>1</sup>

The Court, having considered the Memorandum of Law and Affidavit of Gabriela N. Nastasi in support of Plaintiff's Motion for Default Judgment and a Permanent Injunction Against Defaulting Defendants, the Certificates of Service of the Summons and Complaint, the Certificate of the Clerk of the Court stating that no answer has been filed in the instant action, and upon all other pleadings and papers on file in this action, it is hereby ORDERED, ADJUDGED AND DECREED as follows:

**I. Defaulting Defendants' Liability**

- 1) Judgment is granted in favor of Plaintiff on all claims properly pled against Defaulting Defendants in the Complaint;

**II. Damages Awards**

- 1) IT IS FURTHER ORDERED, ADJUDGED AND DECREED that because it would serve both the compensatory and punitive purposes of the Lanham Act's prohibitions on willful infringement, and because Plaintiff has sufficiently set forth the basis for the statutory damages award requested in its Motion for Default Judgment, the Court finds such an award to be reasonable and Plaintiff is awarded statutory damages in the amount of \$50,000.00

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<sup>1</sup> Where a defined term is referenced herein and not defined herein, the defined term should be understood as it is defined in the Glossary.

(“Defaulting Defendants’ Individual Damages Award”) against each of the eighty-one (81) Defaulting Defendants pursuant to Section 15 U.S.C. § 1117(c) of the Lanham Act, plus post-judgment interest, for a total of Four Million One Hundred Fifty Thousand Dollars (\$4,050,000.00).

### **III. Permanent Injunction**

1) IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that Defaulting Defendants, their respective officers, agents, servants, employees, and all persons acting in concert with or under the direction of Defaulting Defendants (regardless of whether located in the United States or abroad), who receive actual notice of this Order are permanently enjoined and restrained from:

- A. manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in Counterfeit Products or any other products bearing the Angry Birds Marks and/or marks that are confusingly similar to, identical to and constitute a counterfeiting and/or infringement of the Angry Birds Marks;
- B. directly or indirectly infringing in any manner Plaintiff’s Angry Birds Marks;
- C. using any reproduction, counterfeit, copy or colorable imitation of Plaintiff’s Angry Birds Marks to identify any goods or services not authorized by Plaintiff;
- D. using Plaintiff’s Angry Birds Marks, or any other marks that are confusingly similar to the Angry Birds Marks on or in connection with the manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products;

E. secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with: (i) Counterfeit Products; (ii) any computer files, data, business records, documents or any other records or evidence relating to:

- i. Defaulting Defendants' User Accounts and/or Merchant Storefronts;
- ii. Defaulting Defendants' Assets; and
- iii. the manufacture, importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products by Defaulting Defendants and by their respective officers, employees, agents, servants and all persons in active concert or participation with any of them; and

F. effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Accounts, Merchant Storefronts or any other means of importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order.

- 2) IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defaulting Defendants must deliver up for destruction to Plaintiff any and all Counterfeit Products and any and all packaging, labels, tags, advertising and promotional materials and any other materials in the possession, custody or control of Defaulting Defendants that infringe any of Plaintiff's trademarks or other rights including, without limitation, the Angry Birds Marks, or bear any marks that are confusingly similar to the Angry Birds Marks pursuant to 15 U.S.C. § 1118;
- 3) IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Third Party Service Providers and Financial Institutions are permanently enjoined and restrained from:

- A. secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with any computer files, data, business records, documents or any other records or evidence relating to Defaulting Defendants' Assets from or to Defaulting Defendants' Financial Accounts; and
- B. knowingly instructing, aiding or abetting any other person or business entity in engaging in any of the activities referred to in subparagraphs III(1)(A) through III(C)(1) above.

**IV. Dissolution of Rule 62(a) Stay**

- 1) IT IS FURTHER ORDERED, as sufficient cause has been shown, the 30 day automatic stay on enforcing Plaintiff's judgment, pursuant to Fed. R. Civ. Pro. 62(a) is hereby dissolved.

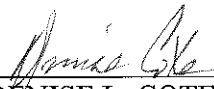
**V. Miscellaneous Relief**

- 1) Defaulting Defendants may, upon proper showing and two (2) business days written notice to the Court and Plaintiff's counsel, appear and move for dissolution or modification of the provisions of this Order concerning the restriction or restraint of Defaulting Defendants' Frozen Assets, Defaulting Defendants' Additional Assets and/or Defaulting Defendants' Additional Financial Accounts;
- 2) Any failure by Defaulting Defendants to comply with the terms of this Order shall be deemed contempt of Court, subjecting Defaulting Defendants to contempt remedies to be determined by the Court, including fines and seizure of property;
- 3) The Court releases the Ten Thousand U.S. Dollar (\$10,000.00) security bond that Plaintiff submitted in connection with this action to counsel for Plaintiff, Epstein Drangel, LLP, 60 East 42<sup>nd</sup> Street, Suite 2520, New York, NY 10165; and

- 4) This Court shall retain jurisdiction over this matter and the parties in order to construe and enforce this Order.

**SO ORDERED.**

SIGNED this 27<sup>th</sup> day of January, 2022, at 2<sup>30</sup> p.m.

  
\_\_\_\_\_  
HON. DENISE L. COTE  
UNITED STATES DISTRICT JUDGE